

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,	: Case No.: 3:16CR01TMR
	:
Plaintiff,	: MOTION TO: (1) EXTEND DUE DATE FOR
	: FINAL PRESENTENCE INVESTIGATION
vs.	: REPORT; AND (2) VACATE CURRENT
	: SENTENCING DATE
REBEKAH RIDDELL,	:
	:
Defendant.	:

Plaintiff United States of America, by and through its counsel of record, the United States Attorney's Office for the Southern District of Ohio, hereby moves the Court to: (1) extend the time within which the United States Probation Office ("Probation Office") must submit its Final Presentence Investigation Report ("Final PSR") in this matter; and (2) vacate this defendant's current sentencing date. The final PSR concerning defendant Rebekah Riddell is due on or about May 6, 2016. The Court has scheduled this defendant's sentencing for approximately two weeks later - namely, May 20, 2016.

Good cause exists for this motion. Ms. Riddell's co-defendant has lodged multiple objections to the Initial PSR. Given the interrelated nature of their cases, resolution of those objections may impact this defendant's Final PSR. To promote judicial economy and to ensure that the parties have adequate time to address these matters, the United States requests that the Court grant another sixty (60) days, up to and including July 1, 2016, within which the Final PSR must be completed.

Accordingly, the United States requests that the Court grant this motion to extend the due date for the Final PSR until July 1, 2016. The United States further requests that, to conform to this proposal, the Court vacate the defendant's current sentencing date.

DATED: May 2, 2016

Respectfully submitted,

BENJAMIN C. GLASSMAN
ACTING UNITED STATES ATTORNEY

s/ Brent Tabacchi
BRENT G. TABACCHI (6276029 IL)
Assistant United States Attorney
Attorneys for Plaintiff
602 Federal Building
200 West Second Street
Dayton, OH 45402
Telephone: (937) 225-2910
Fax: (937) 225-2564
brent.tabacchi@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that, on May 2, 2016, a copy of the foregoing was served on defendant's counsel via the Court's ECF system.

s/Brent G. Tabacchi
BRENT G. TABACCHI
Assistant United States
Attorney